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April 11, 2024

VIA ECF

Hon. Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Vernita Worrell v. Nature Deli Corp. et al.*, Docket No. 1:23-cv-10456-AT

Dear Judge Torres:

We represent Defendant Turbo 228 Livingston Street LLC in the referenced action. We write pursuant to Rule I(C) of Your Honor's Individual Practices in Civil Cases and with Plaintiff's counsel's consent to respectfully request an extension of time for Turbo 228 Livingston Street LLC to answer, move, or otherwise respond to Plaintiff's Amended Complaint to May 1, 2024. We additionally request, with Plaintiff's consent, a brief extension of time to submit a Case Management Plan and Joint Letter from April 16, 2024 to May 15, 2024.

In her complaint, Plaintiff alleges that barriers to accessibility exist at a place of public accommodation. Turbo 228 Livingston Street LLC is the owner of the premises at issue and co-defendant Nature Deli Corp. is the tenant. We were only recently retained and require time to consult with our client to investigate Plaintiff's claim. In addition, we need to coordinate with co-defendant Nature Deli Corp. who has not yet appeared in this action.

This letter motion is Defendant Turbo 228 Livingston Street LLC's first request for an extension of time to respond to the Complaint and to submit a Case Management Plan and Joint Letter.

We thank the Court for its time and consideration.

GRANTED.

SO ORDERED.

Dated: April 12, 2024
New York, New York



ANALISA TORRES
United States District Judge